

**EPG2, LLC.**  
**4267 E. Konker Road**  
**Port Clinton, Ohio 43452**

August 08, 2013

Director, Water Division  
U.S. EPA  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

Reference: Letter Dated July 17, 2013 from above address

In Regard: Clean Water Act Section 308 Information Request V-404-308-13-23

Dear Mr. G. Carlson:

As per your request under the title of "Request For Information" I have answered your listed questions below by your numbered items.

1. Lot 4 of Erie Industrial Park is owned by EPG2, LLC. This LLC is owned by two people Herbert J. Roder and C. Reed Knight Jr. This Lot is 642.743 acres of Dry and Wet Land and is currently leased to two parties. ARES, Inc. is leasing all but 6 acres of this total acreage. The 6 acres is currently leased to Davis-Besse Nuclear Facility. Both of these companies lease the land for weapon testing as the property has been used since 1920. See Attachment "A" for clarification of these locations. I do not know where you have come up with the 212 acres as I have never shown this before. As proof of ownership I have no plat but Attachment "B" is proof of ownership and taxes paid to date. Attachment "C" is the leased area of ARES, Inc. and is used as a firing range with most target placements shown. Attachment "D" is the leased area of Davis-Besse Nuclear Facility which is approx. 6 acres.

2. As per your request I have included "Final Site Inspection Report" which within this report answers all the questions listed under "A thru H" of your letter of July 17, 2013.

3. The area as shown in your "Exhibit 1" is and has been a part of the total weapon firing range since its institution in 1920. The US Government owned and operated this range to proof weapon systems from years 1920 through 1968 at which time it was purchased by USCO a private concern. The area was then leased to ARES for the same purpose that it was originally designed for and has not really changed since that time. This property was then purchased in 2003 by EPG2, LLC. and was again leased to ARES, Inc. for a firing range to proof fire weapon systems for the U.S. Government. The area as shown in your "Exhibit 1" is in the SE corner of Lot 4 and has always been the "Dry Impact Area" and

is shown on the enclosed US Army Corps of Engineers report titled "Final Site Inspection Report" and shown within this report under "Figures". See "Exhibit 1" for a larger view of the "Dry Impact Area" that has your circled areas shown and all these areas have been and are currently "Dry Impact Area". I have added to your Exhibit 1 certain letters to your circled areas for clarification of my response to your questions

3a. Your "Exhibit 1" is shown by dotted lines on "Attachment D"

3b. In 2012 Davis Besse Nuclear Facility made a request of EPG2 to lease approximately 6 acres of the south eastern part of the firing range owned by EPG2 to provide a firing range to certify their 250 Security People on a yearly basis. This leased area is shown on "Attachment D" as "Davis-Besse Nuclear Facility Lease". Davis-Besse provided EPG2, LLC a design layout of their intended firing range and is shown as Attachment "E". Davis-Besse hired "George Gradel Co" to clear the brush and level the area and bring in clay to make dikes around the perimeter of this 6 acres and top it off with topsoil so that the firing range projectiles would be contained within this 6 acres.

3c. George Gradel Co. was the contractor that did the firing range layout drawing according to Davis-Besse requirements as shown on "Attachment E" and this was presented to Davis-Besse for acceptance. Davis-Besse accepted the construction layout drawing.

3d. This is all the information I have

3e. Circle "A". No documentation as such however the area was cleared of brush by using a backhoe and then a brush chipper to cut up the brush. Trenches were dug for surface water drainage, tile installed, and fill from an outside source was applied to level the firing range. Clay was brought in to construct the earthen dikes around the firing range to contain all the fired projectiles.

Circle "B". About 8 years ago ARES was in need of a small arms range so the brush was cut, chipped, and placed at the end of the firing range after which grass was planted in the cleared area. In addition to the Circle "B" wood chips, woodchips from Circle "A" in 2012 were added as a buffer for small arms firing as shown at the end of the small arms firing range.

Circle "C" No change has been made this has been a firing target pad for years.

Circle "D" Excess dirt was piled on this firing target pad during the Davis-Besse range construction and built to a higher elevation. This clay was excess fill taken from agriculture land but I am not sure where.

4. Reference "Exhibit 1"

Circle "A" April 2012 thru September 2012

Circle "B" Summer 2005

Circle "C" No information but prior to 1968

Circle "D" No information but prior to 1968 except top dressing in 2012

5. Your Exhibit 1

Circle "A" Equipment was used by George Gradel and included backhoes, wood chippers, bulldozers, and trucks

Circle "B" backhoe, wood chipper, tractor and grass seeder

Circle "C" No information

Circle "D" To top dress a dump truck and backhoe to level

6. George Gradel was Davis-Besse's hired contractor and neither EPG2, LLC nor ARES, Inc. did the selection of the contractor or had involvement in that contract.

7. George Gradel was Davis-Besse's hired contractor and neither EPG2, LLC nor ARES, Inc. did the selection or had involvement in that contract.

8a. The information in that regard is the designations shown on the Corps of Engineers "Final Site Inspection Report that declare all areas of your concern as Dryland Area and do not require permits for the work completed .

8b. The information in that regard is the designations and Figures shown on the Corps of Engineers "Final Site Inspection Report" that declare all areas of your concern as Dryland Area.

8c Reference Attachment "E"

8d Circle "A" thru "D" have always been a firing range for medium caliber weapons but Circle "A" was changed for Davis-Besse's use as a small arms range and Circle's "B" was changed to allow both medium and small arms weapon firing.

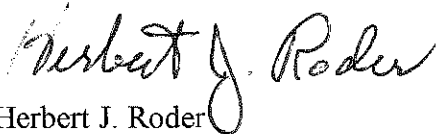
9. EPG2 did not apply for any permits as it is our opinion that no permit is required if the changes made are in the Dryland areas.

10. EPG2 has never applied for a permit from the State of Ohio.

11. ARES, Inc. is the company that leases the area known as Lot 4 (EPG2, LLC.) within Erie Industrial Park

12. Enclosed U.S. Corps of Engineers report titled "Final Site Inspection Report"

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to 18 U.S. C. 1001 and 1341.



Herbert J. Roder  
Member  
EPG2, LLC  
4267 E. Konker Road  
Port Clinton, Ohio 43452

# Exhibit 1



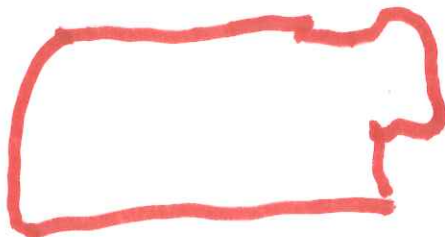
Google Earth Pro

feet 2000  
meters 700



○ - Areas of alleged discharge  
of fill/dredge material

Site =



Attachment " "



Attachment "A"

Lot # 4 EPG2, LLC

636.743 Acres

Leased by ARE8

Lot # 4 EPG2, LLC

6.0 acres

Leased by Davis-Besse Nuclear Facility

Erie Industrial Park





Attachment "B"



**ROBERT J. HILLE, TREASURER OF OTTAWA COUNTY**  
 315 MADISON STREET ROOM 201  
 PORT CLINTON, OH 43452  
 PH. 419-734-6750 FAX 419-734-6738

REAL PROPERTY

2nd HALF 2012

DUE 07/11/2013

PARCEL LOCATION: SR 2 (REAR)

PAID

JUL 01 2013

EPG2 LLC

4267 E KONKER RD

PORT CLINTON OH 43452

  
 Treasurer, Ottawa Co Ohio

PARCEL ID: 016-06645-00004-000

TAX DISTRICT: ERIE TOWNSHIP

OWNER NAME: EPG2 LLC

STUB # 1020397

LEGAL INFORMATION:

 Section: 0 Township: 0 Range: 0  
 LOT 4 ERIE INDUSTRIAL PARK

Gross Tax Rate	79.35	Acres	642.743
Reduction Factor	.418491304	Class	1
Effective Tax Rate	46.142715	Land Use Code	370
<b>TAX VALUES</b>		<b>CURRENT TAX DISTRIBUTION</b>	
Gross Taxes	9,543.42	Ottawa County	841.33
Reduction Factor	-3,993.84	Erie Township	780.63
Subtotal	5,549.58	Port Clinton Csd	3,735.18
10% Rollback	0.00	Vanguard Jvs	192.44
2.5% Rollback	0.00		
Homestead Reduction	0.00	Special Assessment	0.00
CAUV Recoupment	0.00		
Farm Rollback	0.00		
Current Net Taxes	5,549.58		
Current Full Special Asmts	0.00		
Current Net Taxes & Asmts (YEAR)	5,549.58		
Current Half Taxes	2,774.79	<b>Total</b>	<b>5,549.58</b>
Current Half Special Asmts	0.00	<b>CREDIT CARD PAYMENTS:</b> CALL: 1-888-357-8394; CODE 4561 Ottawa County doesn't collect/retain the fee collected <b>MISS A MORTGAGE PAYMENT?</b> DIAL 2-1-1; OR CALL THE O.C. TREASURER <b>VISIT US AT:</b> <a href="http://www.ottawacountytreasurer.org">www.ottawacountytreasurer.org</a> DROP OFF BOX: JEFFERSON STREET ENTRANCE	
Current Half Taxes & Asmts	2,774.79		
Penalties	0.00		
Interest	0.00		
Adjustments	0.00		
Delq Real Estate	0.00		
Delq Special Asmts	0.00		
Omitted Taxes	0.00		
<b>FULL YEAR TAX DUE</b>	<b>5,549.58</b>		
<b>PAYMENTS</b>	<b>2,774.79</b>		
<b>OTHER CREDITS</b>			
<b>TOTAL DUE</b>	<b>2,774.79</b>		
TaxBill prepared on	05/16/13		

APPRAISED VALUE		
Land	Building	Total
213,040	130,610	343,650
TAXABLE VALUE		
Land	Building	Total
74,560	45,710	120,270
HOMESTEAD	CAUV Value	TIF Value
	0	0
SPECIAL ASSESSMENT		
Proj# and Description	Delinquent	Current
<b>Total</b>	<b>0.00</b>	<b>0.00</b>

 TO AVOID 10% PENALTY  
 PAY ON OR BEFORE

07/11/13

If you need a stamped receipt, return entire bill with a self-addressed stamped envelope. No receipt will be returned unless requested

YOUR RETURNED CHECK IS YOUR RECEIPT

Return Bottom Portion with Payment



Attachment "C"

ARES lease





Attachment "D"

EPA's  
Exhibit 1 location



Davis-Besse Nuclear Facility  
Lease